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April 18, 2006

Magalie R. Salas, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Room 1A Washington, D.C. 20426

Re: Broadwater Energy LLC - Docket No. CP06-54-000

Broadwater Pipeline LLC - Docket Nos. CP06-55-000 and CP06-56-000

Dear Secretary Salas:

Enclosed for electronic filing please find the Motion For Leave To Answer And Answer Of The KeySpan Delivery Companies To Motion For Leave To Reply And Reply Comments Of Broadwater Energy LLC and Broadwater Pipeline LLC in the above referenced dockets.

Thank you for your cooperation in this matter.

Yours truly,

Christopher M. H. eywood

UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

In The Matter Of:)	
)	
Broadwater Energy LLC) Dock	et No. CP06-54-000
Broadwater Pipeline LLC)) Dock	ket Nos. CP06-55-000
)	CP06-56-000

MOTION FOR LEAVE TO ANSWER AND ANSWER
OF THE KEYSPAN DELIVERY COMPANIES IN RESPONSE TO
THE MOTION FOR LEAVE TO REPLY AND REPLY COMMENTS OF
BROADWATER ENERGY LLC AND BROADWATER PIPELINE LLC

Pursuant to Rules 212 and 213 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") Rules of Practice and Procedure, 18 C.F.R. §385.212 and 213, the KeySpan Delivery Companies¹ ("KeySpan") hereby submit this Motion For Leave To Answer And Answer in response to the "Motion For Leave To Reply And Reply Comments Of Broadwater Energy LLC and Broadwater Pipeline LLC" filed in the above referenced dockets on April 3, 2006 ("April 3rd Reply"). Broadwater Energy LLC and Broadwater Pipeline LLC (collectively "Broadwater") submitted their April 3rd Reply in response to, among others, KeySpan's Motion To Intervene, Comments and Request For Technical Conference which was filed in this docket on March 10, 2006 ("March 10 Comments").

In support of its requested relief, KeySpan states as follows:

Motion for Leave to Answer

While Rule 213(a)(2) of the Commission's Rules of Practice and Procedure generally prohibits answers to answers,² the Commission has permitted such filings where the proposed answer will clarify the record or otherwise provide the Commission with information that aids it in resolving the matters at

The KeySpan Delivery Companies consist of The Brooklyn Union Gas Company d/b/a KeySpan Energy Delivery New York, KeySpan Gas East Corporation d/b/a KeySpan Energy Delivery Long Island; and Boston Gas Company, Colonial Gas Company, EnergyNorth Natural Gas, Inc. and Essex Gas Company, which collectively are referred to as KeySpan Energy Delivery New England.

² 18 C.F.R. §385.213(a)(2).

issue.³ As discussed more fully below, KeySpan submits that the answer set forth below clarifies certain misstatements in Broadwater's April 3rd Reply and will assist the Commission in its decisionmaking in this proceeding. Accordingly, good cause exists for the Commission to accept KeySpan's proposed answer.

Answer

In its April 3rd Reply, Broadwater asserts that: "KeySpan argues that gas quality parameters consistent with the gas supply currently being delivered by Iroquois should be included in Broadwater's tariff." To clarify, KeySpan's March 10 Filing proposes a set of gas quality specifications intended to:

(a) implement the Interim Guidelines set forth in the Interchangeability White Paper developed by the Natural Gas Council; (b) include other gas quality parameters that would address the impacts associated with the introduction of LNG on facilities such as LNG peak sharing plants and electric generation facilities; and (c) permit Iroquois' system to deliver most of the LNG currently produced throughout the world. A review of KeySpan's proposed specifications (which were attached as Appendix B to its March 10 Filing and are appended hereto as well) reveals that KeySpan is proposing gas quality parameters much broader than the gas supply currently being delivered by Iroquois. ⁴ In the Commission's review of the comments filed in this proceeding, it is important that KeySpan's proposal not be misinterpreted as proposing quality specifications that seek to replicate Iroquois' existing delivered gas supply.

WHEREFORE, for the reasons detailed above, the KeySpan Delivery Companies respectfully request that the Commission accept this answer to be incorporated to the Commission's final orders in this proceeding.

Respectfully submitted,

March 10 Comments, Appendix B.

Natural Gas Pipeline Company of America, 104 FERC ¶61,322 at 62,209, fn. 9 (2003).

The KeySpan Delivery Companies

/s/Kenneth T. Maloney Kenneth T. Maloney Christopher M. Heywood Cullen and Dykman LLP 1101 Fourteenth Street, NW, Suite 550 Washington, D.C. 20005 (202) 223-8890

Dated: April 18, 2006

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties to this proceeding in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated at Washington, D.C. this 18th day of April, 2006.

/s/ Christopher M. Heywood Christopher M. Heywood Cullen and Dykman LLP 1101 Fourteenth Street, NW, Suite 550 Washington, D.C. 20005 (202) 223-8890

Answer.DOC 1-5

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